

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
NORTHERN DIVISION

UNITED STATES OF AMERICA,

CR 20-10007

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

RENEE KAY OLSON,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

At all relevant times herein, Defendant Renee Kay Olson was a resident of Veblen, State and District of South Dakota. Defendant received and sent mail within and outside the State and District of South Dakota. Defendant served as the Treasurer of the Region VIII Head Start Association.

Beginning at a time unknown to the Court and the United States, but no later than in or about September 2014, and continuing to on or about June 2018, within the State and District of South Dakota, and elsewhere, Defendant devised and intended to devise a scheme and artifice to defraud the Region VIII Head Start Association of money and property, and obtained money and property from the Region VIII Head Start Association by means of materially false and fraudulent pretenses, representations, omissions, and promises. For the purpose of carrying out and executing the scheme to defraud, and in furtherance

of the scheme and artifice to defraud, Defendant knowingly caused the following items to be placed in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service or by a private or commercial interstate carrier, and knowingly caused them to be delivered by the United States Postal Service or a private or commercial interstate carrier according to the directions thereon:

On or About Date	Check Number	Check From	Amount
11/13/2017	158703	Sioux Falls School District Eastern Shosone and Northern	828.00
5/17/2018	57487	Arapaho	590.00
11/28/2018	97957	Eagle County Board of Comm'r	148.00
7/2/2018	71431	Hilton	24.00
5/15/2018	19593	Bear River Head Start	1,092.00
5/9/2018	11250	Northwest Montana Head Start	384.00
5/9/2018	72883	Oahe Child Development Center	368.00
Total:			3,434.00

Defendant's conduct was in violation of 18 U.S.C. § 1341.

Defendant also falsified invoices, paid herself for travel she did not take, and unlawfully converted to her own use membership dues, by claiming those payments as Accounting Fees, the following:

On or about Date	Check Number	Accounting Fee	Travel
9/20/2014	1611	600.00	
12/1/2014	1629	600.00	
2/20/2015	1633	600.00	
3/10/2015	1644	600.00	
5/1/2015	1648	600.00	
7/22/2015	1663	1,200.00	
11/12/2015	1677	600.00	
2/24/2016	1682	600.00	
4/14/2016	1690	600.00	

7/18/2016	1704	1,200.00	
8/8/2016	1705	1,000.00	
8/22/2016	1706	1,000.00	
12/1/2016	1715	800.00	
1/10/2017	1719	700.00	
2/4/2017	1718		1,050.46
3/15/2017	1728	600.00	
5/5/2017	1735	600.00	
5/18/2017	1736	600.00	
7/6/2017	1744	600.00	
8/3/2017	1745	800.00	
9/25/2017	1749	600.00	
10/23/2017	1747		994.91
12/4/2017	1750	600.00	
3/6/2018	1758	1,200.00	
3/29/2018	1766		1,402.37
4/8/2018	1765	850.00	
 Subtotals		17,150.00	3,447.74
 Total		 <hr/> 20,597.74	

Defendant's conduct resulted in a total loss of approximately \$24,031.74 to the Region VIII Head Start Association. At a minimum, Defendant's conduct was in violation of 18 U.S.C. § 1341.

RONALD A. PARSONS, JR.
United States Attorney

Date

1/27/20

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16 Jan 2020
Date

Renée Kay Olson
RENEE KAY OLSON
Defendant

16 Jan 2020
Date

Thomas L. Sannes
THOMAS L. SANNE
Attorney for Defendant